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**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

	)	
FORTRESS CREDIT	)	
OPPORTUNITIES I, LP and	)	CASE NO. 07-CV-7369 (HB)
FORTRESS CREDIT	)	
OPPORTUNITIES II, LP,	)	
	)	
Plaintiffs,	)	
v.	)	
	)	
WAYNE C. COLEMAN, THE	)	
ROYALTY COMPLIANCE	)	
ORGANIZATION and MOSS ADAMS	)	
LLP,	)	
	)	

**DECLARATION OF DOROTHY M. WEBER IN SUPPORT OF  
DEFENDANTS WAYNE C. COLEMAN AND THE ROYALTY  
COMPLIANCE ORGANIZATION'S MOTION TO DISMISS**

Dorothy M. Weber, an attorney duly admitted to practice law by and before this Court and the Courts of the State of New York hereby declares, pursuant to 28 U.S.C. §1746, under penalties of perjury, as follows:

1. I am a member of the firm Shukat Arrow Hafer Weber & Herbsman LLP, attorneys for Defendants Wayne C. Coleman and the Royalty Compliance Organization<sup>1</sup> (the "RCO Defendants") and I submit this

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<sup>1</sup> The Royalty Compliance Organizations is a d/b/a of Financial Services Team, Inc., a Missouri corporation.

Declaration in support of the RCO Defendants' motion to dismiss the Amended Complaint asserted herein against the RCO Defendants (Count I) pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure or, in the alternative, to stay these proceedings.<sup>2</sup>

2. The arguments supporting the RCO Defendants' motion are set forth in the accompanying memorandum of law, to which the Court is respectfully referred.

3. Attached as Exhibit A is a true and correct copy of Plaintiffs' Amended Complaint dated August 17, 2007.

4. Attached as Exhibit B is a true and accurate copy of the Declaration of Thomas R. Manisero dated September 18, 2007 in Support of Defendant Moss Adams LLP's Motion for Judgment, together with Exhibit D, annexed thereto.

5. Attached as Exhibit C is a true and accurate copy of the Declaration of Michael C. Harwood October 2, 2007 in Opposition to Defendant Moss Adams LLP's Motion for Judgment, together with Exhibit 1, annexed thereto.

6. Attached as Exhibit D is a true and accurate copy of the Memorandum of Law in Support of the Motion to Dismiss of Defendant Fortress Credit Opportunities I, LP dated July 1, 2005, Johnson v. The Songwriter Collective, LLC et al. 2005 WL 2483902 (M.D. Tenn.)

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<sup>2</sup> Count II is asserted against Defendant Moss Adams LLC only.

7. Attached as Exhibit E is a true and accurate copy of the Decision/Order of Justice Barbara R. Kapnick dated July 19, 2005 in the matter of Roboff v. E. Jean Mason, Budd Carr, Robert D'Loren, The Songwriters Collective, LLC, UCC Capital Corp., Fortress Credit Opportunities I, LP. Index No. 600528/05.

8. Attached as Exhibit F is a true and accurate copy of the Decision/Order of Justice Barbara R. Kapnick dated May 31, 2006 in the matter of Roboff v. E. Jean Mason, Budd Carr, Robert D'Loren, The Songwriters Collective, LLC, UCC Capital Corp., Fortress Credit Opportunities I, LP. Index No. 600528/05.

9. Attached as Exhibit G is a Schedule of litigation filed by former members of The Songwriters Collective naming Fortress Credit Opportunities I, LP as a defendant in matters which relate to the above-captioned action.

I DECLARE UNDER THE PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT

Dated: New York, New York  
November 9, 2007



Dorothy M. Weber